

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JONATHAN LANGLEY
Plaintiff

v.

INTERNATIONAL BUSINESS MACHINES
CORPORATION
Defendant

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CASE NO. 1:18-CV-00443-LY

**PLAINTIFF JONATHAN LANGLEY'S DESIGNATION OF
REBUTTAL EXPERT WITNESS**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

NOW COMES, Plaintiff, Jonathan Langley, and pursuant to the Scheduling Order, files and serves on Defendant his Designation of the Rebuttal Expert Thomas W. Glass, PhD., CPA. All material required under Rule 16(a)(2)(B) of the Federal Rules of Civil Procedure shall be served on Defendant but not filed with the Court.

I. DESIGNATION OF REBUTTAL EXPERT

The following individual is hereby designated as a potential rebuttal and testifying expert who Plaintiff may call. Dr. Glass is designated as an individual with expert knowledge within their respective area of expertise and may be called upon to testify in Court and/or through their records:

Rebuttal Expert

Dr. Glass had available for review the following:

1. PDFs titled IBML-

- 000110
- 000197
- 000208
- 000340

- 000372
 - 000483
 - 000495
 - 000500
 - 000749
2. Langley-IBM 0536-0558.pdf
 3. Langley-IBM 0865
 4. Report of Dwight Steward, PhD, June 11, 2019
 5. Confidentiality and Protective Order
 6. Email from Wright & Greenhill, PC dated 5/28/2019

Dr. Glass is an expert in the field of economics and accounting. His qualifications are more fully set forth in the resumé included in his Report, which is incorporated by reference. Dr. Glass will generally testify about Jonathan Langley's economic losses. Dr. Glass' opinions are more fully set out in his Report, which is incorporated by reference and provided to the Defendant separately. Dr. Glass's fee schedule is included in his report. Dr. Glass has testified as a retained expert in the last four (4) years. See the case list attached to his Report, which is incorporated by reference.

Respectfully submitted,



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***ATTORNEYS FOR PLAINTIFF
JONATHAN LANGLEY***

CERTIFICATE OF SERVICE

I hereby certify that on 25th day of June, 2019, I electronically filed the foregoing Plaintiff's Designation of Rebuttal Witness with the Clerk of Court using the CM/ECF system, which sent notification of such filing to the Court and Defendant's counsel.

A handwritten signature in black ink, appearing to be 'H. Coughlin', written over a horizontal line.

Heidi A. Coughlin